National Aeronautics and Space Administration
Headquarters
Washington, DC 20546-0001

June 16, 2008

Reply to Attn of:

General Law Practice Group

TO: Distribution

FROM: Alternate Designated Agency Ethics Official

SUBJECT: Determination Regarding Attendance by NASA Employees a Breakfast co-hosted by Members of Congress; and by United Space Alliance, Rayburn Office Building, June 26, 2008

On June 26, 2008, Congressmen Nick Lampson (D-TX.), and Mark Udall (D-CO.) will co-sponsor, with assistance of United Space Alliance (USA), a breakfast featuring astronauts Gregory Johnson, and Michael Foreman, recently returned from STS-123, to speak at a breakfast reception, to be held on Thursday, June 26 from 9 a.m. to 10 a.m. in the Rayburn office building. While the congressmen are hosting the event overall, breakfast items are being provided by USA. The breakfast items will be coffee and pastries only. USA has existing contracts with NASA.

The presentation will be attended by representatives of the aerospace industry, trade associations, the media, Congressional staffers, members of Congress, academia, and other Federal agencies. Approximately 50-60 Congressional members and staff, and 20-30 industry representatives are expected to attend. About 5-10 NASA employees have been invited. The estimated cost of the breakfast is not more than $20.00 per person.

I find that this reception event meets the requirements of a "widely attended gathering" as defined in 5 C.F.R. § 2635.204(g). I further determine that there is an Agency interest in having NASA personnel attend the event because it will further dissemination of Agency programs and operations. Attendance at the breakfast presentation will allow NASA personnel to hear ISS astronauts speak about NASA missions, accomplishments and results, and to interact with other persons from government and industry concerned with making and implementing U.S. space policy. Accordingly, NASA employees whose duties do not substantially affect USA may accept an invitation for free attendance to the reception for themselves and their spouses or guests. NASA employees whose duties may substantially affect USA, such as by way of procurement duties, should seek an individual determination pursuant to 5 C.F.R. § 2635.205(g) (3) (i) regarding participation in this event from their local ethics counselor.

Adam F. Greenstone